

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MERCEDES BENZ USA LLC,

PLAINTIFF,

-AGAINST-

JAMES LEWIS, JEFF SOTO, MAXX GRAMAJO,
AND DANIEL BOMBARDIER

DEFENDANTS.

No.: 2:19-cv-10948

STIPULATED ORDER EXTENDING DISCOVERY DEADLINES

WHEREAS, on February 3, 2020, the Court issued a Scheduling Order governing the liability phase of the case (ECF No. 44, herein the “Scheduling Order”), setting a discovery cut-off deadline of June 2, 2020, with interim deadlines for, *inter alia*, lay and expert witness lists filed by March 6, 2020, Plaintiff’s Rule 26(a)(2) expert disclosures exchanged by April 7, 2020, and Defendants’ Rule 26(a)(2) expert disclosures exchanged by May 5, 2020. The Court further set July 17, 2020 as the dispositive motion cut-off.

WHEREAS, the parties have previously agreed to postpone the deadline for responses and objections to each side’s initial fact discovery requests in view of continued discussions following the parties’ January 23, 2020 mediation in Los

Angeles. Accordingly, the parties have not yet served document productions or responses to interrogatories, which are to be exchanged this month.

WHEREAS, the parties wish to receive responses to their first set of fact discovery requests sufficiently in advance of filing lay and expert witness lists and in advance of exchanging Rule 26(a)(2) expert disclosures to consider such discovery in advance of making lay and expert witness disclosures.

WHEREAS, the parties' stipulated schedule for modifying deadlines in the Scheduling Order does not impact subsequent dates set by the Court.

NOW IT IS THEREFORE STIPULATED AND AGREED, by the undersigned counsel on behalf of Plaintiff Mercedes Benz USA LLC and Defendants James Lewis, Jeff Soto, Maxx Gramajo, and Daniel Bombardier, that pursuant to the Court's Individual Practices regarding stipulated extensions of discovery, the Scheduling Order is modified to the following extent:

1. Lay and expert witness lists shall be filed by April 17, 2020.
2. Plaintiff's Rule 26(a)(2) expert disclosures shall be exchanged by May 8, 2020.
3. Defendants' Rule 26(a)(2) expert disclosures shall be exchanged by June 5, 2020.

4. Depositions of expert witnesses shall be completed by July 2, 2020. The June 2, 2020 discovery cut-off deadline in the Scheduling Order remains for all other discovery.

5. All other deadlines in the Scheduling Order remain as set forth therein.

IT IS SO ORDERED.

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: March 6, 2020

Dated: March 4, 2020

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Dated: March 4, 2020

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